

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

UNITED SPECIALTY INSURANCE
COMPANY,

Plaintiff,

v.

LUX MAINTENANCE & REN. CORP.,
CORNELL UNIVERSITY,
ROCKEFELLER UNIVERSITY, THE
SOCIETY OF THE NEW YORK
HOSPITAL, MEMORIAL HOSPITAL
FOR CANCER AND ALLIED DISEASES,
and MANHATTAN EYE EAR &
THROAT HOSPITAL,

Defendants.

Civil Action –
Complaint for Declaratory Judgment

Case No.: 1:18-cv-03083-ER

**NOTICE FOR DISCOVERY
AND INSPECTION**

PLEASE TAKE NOTICE, that pursuant to the applicable provisions of the CPLR, defendants hereby demand that plaintiff produce for discovery, inspection and copying, the following documents in plaintiff's possession, custody, or control:

1. A complete, certified copy of the policy of insurance issued by plaintiff to LUX MAINTENANCE & REN. CORP. that was in effect at the time of the underlying incidents.

PLEASE TAKE FURTHER NOTICE, that these demands are continuing in nature. If any responsive information is obtained after the date of this demand, it is to be immediately furnished to us. If you fail to comply, we shall rely on all sanctions provided by law.

DATED: June 4, 2018

STONBERG MORAN, LLP
Attorneys for Defendants
CORNELL UNIVERSITY, ROCKEFELLER
UNIVERSITY, THE SOCIETY OF THE NEW YORK
HOSPITAL, MEMORIAL HOSPITAL FOR
CANCER AND ALLIED DISEASES, and
MANHATTAN EYE EAR & THROAT HOSPITAL

By: 

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TO:

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